

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JEFFREY KALOUSTIAN, ON
BEHALF OF HIMSELF AND ALL
OTHERS SIMILARLY SITUATED,

Plaintiff,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 19-CV-13197

Hon. Sean F. Cox

Magistrate Elizabeth A. Stafford

STIPULATED ORDER STAYING CASE

The matter having come before the Court upon the Stipulation of the undersigned Parties:

1. This putative class action arises out of Plaintiff's allegations that Ford Motor Company made false and deceptive representations to consumers concerning the fuel economy ratings of select Ford-brand vehicles.

2. There are at least 19 other putative class actions asserting fuel economy-based claims relating to Ford's marketing and sale of the subject vehicles.

Those cases are:

- *Cook v. Ford Motor Company*, No. 2:19-CV-00335 (M.D. Ala.)
- *Drake v. Ford Motor Company*, No. 2:19-CV-14165 (S.D. Fla.)
- *Hubert v. Ford Motor Company*, No. 2:19-CV-02125 (C.D. Ill.)
- *Lloyd v. Ford Motor Company*, No. 19-CV-11319 (E.D. Mich.)
- *Travis v. Ford Motor Company*, No. 2:19-CV-11639 (E.D. Mich.)
- *Dawson et al. v. Ford Motor Company*, No. 19-CV-11728 (E.D. Mich.)

- *Riverside Turf Farm, Inc., et al. v. Ford Motor Company*, 1:19-CV-00102 (M.D. Ga.)
- *Goodfriend et al. v. Ford Motor Company*, No. 2:19-CV-03794 (E.D.N.Y.)
- *Napier v. Ford Motor Company*, No. 1:19-CV-14639 (NJ)
- *Allen et al. v. Ford Motor Company*, No. 19-CV-12015 (E.D. Mich.)
- *Smith v. Ford Motor Company*, No. 19-CV-11993 (E.D. Mich.)
- *Fencl v. Ford Motor Company*, No. 1:19-CV-14714 (NJ)
- *Piñon v. Ford Motor Company*, No. 1:19-CV-02044 (CO)
- *Arendt v. Ford Motor Company*, No. 0:19-CV-01886 (MN)
- *Sartip et al. v. Ford Motor Company*, No. 19-CV-05905 (C.D. Cal.)
- *Beavers v. Ford Motor Company*, No. 19-CV-12080 (E.D. Mich.)
- *Brewer, et al v Ford Motor Company*, No. 2:19-CV-12135 (E.D. Mich.)
- *Haynes, et al v Ford Motor Company*, No. 2:19-CV-12427 (E.D. Mich.)
- *Anderson v Ford Motor Company*, No. 2:19-CV-12554 (E.D. Mich.)

3. On May 9, 2019, Plaintiffs in the *Cook* and *Hubert* actions jointly filed with the United States Judicial Panel on Multidistrict Litigation (the “Panel”) a motion to transfer pursuant to 28 U.S.C. § 1407 (“Transfer Motion”). The Transfer Motion contends that transfer and coordination are appropriate because the identified cases “involve common questions of law and fact,” which handled together will “benefit the parties, the witnesses, and the courts.”

4. On August 1, 2019, the Panel ordered consolidation before the Honorable Judge Sean F. Cox. *See* Transfer Order, MDL 2901.

5. The parties agree that this is a tag along action to MDL 2901, as that term is defined by Rule 1.1(h) of the Rules of Multidistrict Litigation.

6. On November 6, 2019 Judge Cox order an initial Status Conference to be held on Monday, December 16, 2019.

6. The parties agree that a brief stay of this action will promote judicial efficiency and consistency, and that neither the parties nor the progress of the action will be prejudiced by such a stay.

7. The parties agree that the stay shall not prevent any plaintiff from amending his or her complaint as a matter of right.

8. The parties therefore agree and stipulate that, subject to this Court's approval, this matter is stayed until further order of the Court.

WHEREFORE, it is hereby **ORDERED** that this matter is **STAYED** until further order of the Court.

SO ORDERED.

Dated: December 3, 2019

s/Sean F. Cox

Sean F. Cox

U. S. District Judge

STIPULATED AND AGREED TO BY:

By: /s/ Stephanie A. Douglas
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Dated: November 12, 2019

By: /s/ Paul F. Novak (w/consent)
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Dated: November 12, 2019

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